

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ISHAN WAHI, NIKHIL WAHI, and SAMEER
RAMANI,

Defendants.

Civil Action No. 2:22-cv-1009

DECLARATION IN SUPPORT
OF MOTION FOR ENTRY OF
DEFAULT AS TO DEFENDANT
SAMEER RAMANI

Peter C. Lallas declares as follows:

1. I am conditionally admitted to the Bar of this Court pursuant to Local Rule 83.1 and represent the Securities and Exchange Commission (“Commission”), the plaintiff in this action.

2. This action was commenced on July 21, 2022, by the filing of the Commission’s Complaint against Defendants Ishan Wahi, Nikhil Wahi, and Sameer Ramani. On December 22, 2022, the Commission filed an Amended Complaint.

3. On May 22, 2023, this Court issued an Order authorizing service by alternative means on Defendant Ramani. ECF No. 106. That Order directed the Commission to effect service of the Amended Complaint and Summons on Defendant Ramani by email to david.kornblau@dentons.com and samyramani@gmail.com, and by WhatsApp to the account with username “mrsamram” and associated with phone number +91 9920625464. ECF No. 106.

4. On May 26, 2023, I sent an email to david.kornblau@dentons.com and samyramani@gmail.com with the Complaint, Amended Complaint, and Summons attached. I

1 received no error messages in response to this email.

2 5. The Commission contracted with Cavalier Courier & Process Service
3 (“Cavalier”) to effect service through WhatsApp. On May 26, 2023, Cavalier reported that
4 there is no active member of WhatsApp with phone number +91 9920625464 and that there is
5 no way to find a WhatsApp contact using solely a username. Therefore, Cavalier was unable
6 to send the Summons and Complaint by WhatsApp to the username and phone number
7 identified in the Court’s Order authorizing alternative service.
8

9 6. The time for Defendant Sameer Ramani to answer or otherwise move with
10 respect to the Amended Complaint herein expired on June 20, 2023.

11 7. Defendant Sameer Ramani has not answered or otherwise moved with respect to
12 the Amended Complaint, and the time for him to answer or otherwise move has not been
13 extended.
14

15 8. Defendant Sameer Ramani is not an infant, is not incompetent, and is not
16 presently in the military service of the United States as appears from facts in this litigation.

17 9. I declare under penalty of perjury that the foregoing is true and accurate to the
18 best of my knowledge, information and belief.
19

20 Executed on October 19, 2023.
21

22 /s/ Peter C. Lallas

23 Peter C. Lallas
24 Attorney for Plaintiff
25 Securities and Exchange Commission
26